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July 27, 2020

**VIA ECF**

The Honorable Jan E. DuBois  
The Honorable Thomas J. Rueter  
U.S. District Court  
Eastern District of Pennsylvania  
601 Market Street  
Philadelphia, PA 19106

**Re: Aspen Specialty Insurance Company v. Hospitality Supportive Systems, LLC, et al., Docket No.: 16-cv-01133**

Dear Judge DuBois and Judge Rueter,

We write on behalf of Aspen Specialty Insurance Company ("Aspen") in follow up to the mediation held in connection with the above referenced matter on July 21 and July 22 before Judge Rueter. The mediation sessions have progressed discussions regarding the settlement of certain parts of this case. In order to continue to progress these discussions, Aspen requests that this Honorable Court stay all currently so-Ordered deadlines and appearances in the above referenced matter for the next 30 days.

The purpose of this stay request is to avoid the HSS Parties' counsel from further depleting the limits of available insurance policies (the existence of which were only recently revealed in clear violation of the Federal Rules of Civil Procedure). These policies appear to have already been significantly eroded, and were not previously disclosed to any other party as required under Federal Rule of Civil Procedure 26. Aspen further requests that an explicit carve out is made in any stay requiring that the HSS Parties disclose forthwith any and all available insurance.

As part of this stay, Aspen notes that the court has ordered the HSS Parties and Aspen to meet and confer regarding certain discovery issues and exchange documents and information over the coming weeks. See, Order dated July 16, 2020 at ECF 224. The intent of this stay request is to allow the parties to minimize and/or avoid legal spend during that time frame, including in connection with these obligations, which could potentially result in more fruitful settlement discussions during the stay period. Therefore, Aspen also requests that 45 days be added to each of the upcoming deadlines contained in ECF 224. By adding 45 days to these deadlines, Aspen and the HSS Parties can address these matters after the stay is lifted.

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Relatedly, Aspen respectfully requests that the Court set a conference after the stay to address defendant McGriff, Siebels & Williams' letter of June 23, 2020 regarding the current discovery schedule. Aspen and defendant Inservco Insurance Services join in McGriff's request, which remains unopposed. Following the stay period and ongoing settlement discussions, the parties will be in a better position to address this request with the Court.

Respectfully submitted,

/s William D. Deveau

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